

THE HON. RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JACOB T. WILFONG, individually; and  
DONAMARIE N. WILFONG and  
DONALD J. WILFONG, individually and  
the marital community composed  
thereof,

Plaintiffs,

v.

LYFT, INC., a foreign corporation; LYFT,  
INC., d/b/a Lyft Washington, Inc., a  
foreign corporation; ABDIRAZACK A.  
JAMMA and JANE DOE JAMMA,  
individually and the marital community  
composed thereof; and ABDULKADIR A.  
OMAR and JANE DOE OMAR,

Defendants.

No.: 2:24-cv-00418-RSM

STIPULATED MOTION TO  
CONTINUE INITIAL DISCOVERY  
DEADLINES

Noted on Motion Calendar: June 6, 2024

**STIPULATION**

Defendant Abdirazack A. Jamma and Jane Doe Jamma, and Plaintiffs Jacob  
T. Willfong, Donamarie N. Wilfong and Donald J. Wilfong, and Defendants Lyft,  
Inc., a foreign corporation, and Lyft, INC., d/b/a Lyft Washington, Inc., (collectively,  
the “Parties”) respectfully request a short extension of the initial discovery

1 deadlines in this lawsuit.<sup>1</sup> Counsel for Plaintiffs and counsel for Defendant Jamma  
2 spoke with each other on May 28th via telephone and agreed to a 30-day extension  
3 on the current discovery deadlines. On May 29th, counsel for Defendant Lyft and  
4 Defendant Lyft, Inc., d/b/a Lyft Washington, Inc., a foreign corporation, also  
5 confirmed her agreement to the 30-day extension of the current discovery deadlines.  
6 The parties are attempting early resolution and settlement discussions before  
7 incurring the expense of formal discovery.  
8

9 Accordingly, the Parties believe that there is good cause under Federal Rule  
10 of Civil Procedure 6(b) and Local Civil Rule 10(g) for a continuance of the initial  
11 discovery deadlines.  
12

13 The Parties, through their counsel request and stipulate to the following  
14 proposed extensions of the deadlines in the Court's Order Regarding Initial  
15 Disclosures, Joint Status Report, and Early Settlement (Dkt. 4):  
16

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25

26 <sup>1</sup> Defendants Abdulkadir A. Omar and Jane Doe Omar have not appeared in the case yet.

| Event  | Current Deadline | New Deadline Requested |
|--|------------------|------------------------|
| Initial Disclosures Pursuant to FRCP 26(a)(1)  | 06/07/2024       | 7/8/2024               |
| Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Rule 26(f) | 06/14/2024       | 7/15/2024              |

DAVIS LAW GROUP, PS

MALONEY LAUERSDORF REINER,  
PC

By: /s/ Courtney K. Hansen  
Christopher M. Davis, WSBA  
#23234  
Courtney K. Hansen, WSBA #43872

By: /s/ Katie D. Buxman  
Katie D. Buxman, WSBA #32867  
Email: kb@mlrlegalteam.com

Attorneys for Plaintiff

Attorneys for Defendant Abdirazack A.  
Jamma and Jane Doe Jamma

BULLIVANT HOUSER BAILEY PC

By: /s/ Evelyn E. Winters  
Evelyn E. Winters, WSBA #44936  
E-mail:  
evelyn.winters@bullivant.com  
Vanessa G. Aaron, WSBA #60826  
E-mail:  
vanessa.aaron@bullivant.com

Attorneys for Defendants Lyft, Inc., a  
foreign corporation, and Lyft, Inc., d/b/a  
Lyft Washington, Inc., a foreign  
corporation

**ORDER**

IT IS SO ORDERED this 6<sup>th</sup> day of June, 2024.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on April 30, 2024, the STIPULATED MOTION TO CONTINUE INITIAL DISCOVERY DEADLINES was served on the following parties at the following address by sending to them a true copy thereof via the method indicated below:

Courtney Hansen  
Chris Davis  
Davis Law Group PS  
2101 4<sup>th</sup> Ave. #1030  
Seattle, WA 98121  
[courtney@davislawgroupseattle.com](mailto:courtney@davislawgroupseattle.com)  
[chris@davislawgroupseattle.com](mailto:chris@davislawgroupseattle.com)  
*Of Attorneys for Plaintiffs*

Evelyn Winters  
Vanessa Aaron  
Bullivant Houser Bailey PC  
925 4<sup>th</sup> Ave. #3800  
Seattle, WA 98104  
[evelyn.winters@bullivant.com](mailto:evelyn.winters@bullivant.com)  
[vanessa.aaron@bullivant.com](mailto:vanessa.aaron@bullivant.com)  
*Of Attorneys for Lyft, Inc.*

X by electronic means through the Court's ECF System on the date set forth above.

☐ by mailing a full, true and correct copy thereof in a sealed, first-class postage paid envelope, addressed to the attorneys as shown above, and deposited with the United States Postal Office at Portland, Oregon on the date set forth above.

X by emailing to each of the foregoing a copy thereof to the email address above.

MALONEY LAUERSDORF REINER, PC

By /s/ Katie D. Buxman

Katie D. Buxman WSBA #32867  
Email: [kb@mlrlegalteam.com](mailto:kb@mlrlegalteam.com)  
Ryan P. Mattson, WSBA #56204  
Email: [rpm@mlrlegalteam.com](mailto:rpm@mlrlegalteam.com)

Of Attorneys for Defendants Jamma